



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

January 19, 2016

Mrs. Amy Burt, NWSTF Boardman Project Manager
Naval Facilities Engineering Command, Northwest
1101 Tautog Circle, Suite 203
Silverdale, Washington 98135-1101

Dear Mrs. Burt:

The EPA has reviewed the Navy's December 2015 Final EIS for the Naval Weapons Training Facility Boardman (EPA Region 10 Project Number: 10-0052-DOD). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

To address our concerns about impacts on wildlife and biodiversity - such as local declines in Washington ground squirrel populations - our 2012 DEIS comments included a recommendation for the FEIS to describe proposed decision points and metrics to support adaptive management. Updated adaptive management information in the FEIS addresses our concern and is fully responsive to our recommendation.¹ We especially appreciate the Navy's commitment and detailed plan to provide a net benefit for Washington ground squirrel habitat functions and values.² We believe that achieving a net benefit for the Washington ground squirrel habitat is consistent with the President's November 3, 2015 Memorandum, "Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment"³

Our 2012 DEIS comments also included a recommendation for the FEIS to include additional information on the effects of discrete sound events on elementary age children and Traditional Cultural Properties. Additional information in the FEIS on discrete sound events is responsive to our concern and recommendation - including especially the October 2015 Memorandum of Agreement among the Navy, Oregon State Historic Preservation Office, Confederated Tribes of the Umatilla Indian Reservation, and Advisory Council on Historic Preservation.⁴

With regard to expended materials and metals, we reiterate our interest in EPA and Oregon Department of Environmental Quality review opportunities for range assessment sampling plans because we remain concerned about long-term effects from the accumulation of materials and metals on the range. We also note that while the Navy's Range Sustainability Environmental Program Assessment (RSEPA) protocols

¹ Specifically section 1.6.3 "Management Objectives and Decision Points" from the U.S. Fish and Wildlife Service 2013 Conference Opinion, an effort that was initiated by the Navy and is included in the FEIS as Appendix B.

² Including, for example, section 1.5.7 "Mitigation Ratios" from the U.S. Fish and Wildlife Service 2013 Conference Opinion, an effort that was initiated by the Navy and is included in the FEIS as Appendix B.

³ <https://www.whitehouse.gov/the-press-office/2015/11/03/mitigating-impacts-natural-resources-development-and-encouraging-related>

⁴ Included in FEIS Appendix C.

may include the sampling methods recommended in our DEIS comment, we continue to encourage the Navy to sample within target zones, impact areas and ground firing points - in addition to perimeter sampling. Sampling target zones, impact areas and ground firing points is important because they are the most likely sources of contamination on operational ranges. We believe that sampling starting at the potential contamination source is technically better than at the boundaries, given, for example, errors and challenges in assessing migration from the unsaturated zone to groundwater.

Thank you for your consideration of our comments and if you have any questions, please contact me at (206) 553-1601 or by electronic mail at littleton.christine@epa.gov or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is fluid and cursive, with the first name "Christine" and last name "Littleton" clearly legible, and a middle initial "B." in between.

Christine Littleton, Manager
Environmental Review and Sediment Management Unit